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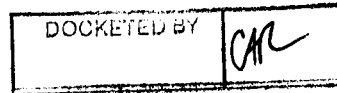
Arizona Corporation Commission

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**AZ CORP COMMISSION
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7 **BEFORE THE ARIZONA CORPORATION COMMISSION**

8 IN THE MATTER OF U S WEST
9 COMMUNICATIONS, INC.'S COMPLIANCE
10 WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

**QWEST CORPORATION'S FIRST
QUARTERLY FILING OF ACTUAL CLEC
EDI RESPONSE TIMES**

11
12 Qwest Corporation (Qwest) hereby provides aggregated actual CLEC EDI response times
13 for the months of January, February and March 2003, produced in compliance with the Arizona
14 Corporation Commission Staff's Impasse Issue #940 Resolution: Use of IRTM for PID PO-1B.
15 In this resolution, Staff required Qwest to develop the capability to report actual CLEC Pre-
16 Order/Order Response Times for EDI transactions at Qwest's Interactive Agent (IA) by year end
17 2002, and to track these results with PO-1B until the 18 and/or 24 month review, at which time a
18 decision will be made whether to modify the PIDs to utilize EDI response times as measured at
19 the Qwest IA.¹

20
21 On February 12, 2003, Qwest filed its Notice of Compliance Regarding CLEC Actual
22 EDI Response Times (Notice of Compliance), confirming that Qwest had developed the required
23 capability to report actual CLEC Pre-Order/Order response times for EDI transactions and
24

25
26 ¹ Staff's Impasse #940 resolution: Use of IRTM for PID PO-1B at section E.

proposing that the monthly aggregated results be reported on a quarterly basis until the 18 and/or 24 month review. Accordingly, Qwest submits this first quarterly filing of CLEC aggregated EDI response times. Subsequent filings will be submitted by the end of the month following the end of each calendar quarter during the 18 and/or 24 month period. These reports will provide regional results for actual CLEC EDI response times (including results for CLECs on any version of EDI) and IRTM.

The results for each month in the first quarter of 2003 are listed below. The "IRTM" column was moved to the right hand side of the chart to allow the reader to more easily view all CLEC average response times. Qwest has also added a "Differences" column on the far right hand side of the chart to reflect the difference between the average CLEC results and average IA processing times. Finally, the title of the chart has been changed to "Transactions for CLECs on all Releases Compared to IRTM Transactions."

Transactions for CLECs on all Releases Compared to IRTM Transactions -- Jan 2003								
CLEC	TRANS_TYPE	CLEC Obs	Avg. Time (1)	Avg. IA Process Time (Inbound) (2)	Avg. IA Process Time (Outbound) (3)	CLEC Avg - IA process (1)-(2)-(3)	IRTM Avg. Time (4)	Differences
ALL CLECs	ADDRVAL	63848	6.953	2.577	1.201	3.175	2.58	0.595
(Excluded IRTM CLEC)	SERVAVAIL	0	N/A	N/A	N/A	N/A	9.49	N/A
	CSR	59675	7.108	2.407	1.131	3.57	3.16	0.41
	APPTSCHED	1469	3.83	0.336	0.318	3.176	3.41	-0.234
	TN	1008	6.535	0.352	0.291	5.892	5.67	0.222
	FACCHECK	853	8.593	0.332	0.387	7.874	6.05	1.824
	ADSL LOOPQUAL	2552	28.531	1.372	0.466	26.693	15.36	11.333
	RESALE LOOPQUAL	0	N/A	N/A	N/A	N/A	6.65	N/A
	CFA	388	7.965	0.35	0.094	7.521	8.45	-0.929
	MPQ	0	N/A	N/A	N/A	N/A	5.09	N/A

Transactions for CLECs on all Releases Compared to IRTM Transactions – Feb 2003								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg – IA process	IRTM	Differences
		Obs.	Time (1)	Process Time	Process Time	(1)–(2)–(3)	Avg.	
				(Inbound) (2)	(Outbound) (3)		Time (4)	
ALL CLECs	ADDRVAL	225371	4.466	1.21	0.531	2.725	2.64	0.085
(Excluded	SERVAVAIL	0	N/A	N/A	N/A	N/A	10.3	N/A
IRTM CLEC)	CSR	129011	5.991	1.702	0.779	3.51	3.32	0.19
	APPTSCHED	1009	3.878	0.337	0.267	3.274	3.47	-0.196
	TN	898	6.456	0.365	0.261	5.83	5.32	0.51
	FACCHECK	599	7.978	0.337	0.262	7.379	5.99	1.389
	ADSL LOOPQUAL	2380	24.827	1.079	0.302	23.446	14.77	8.676
	RESALE LOOPQUAL	0	N/A	N/A	N/A	N/A	5.51	N/A
	CFA	26	6.742	0.344	0.092	6.306	8.53	-2.224
	MPQ	0	N/A	N/A	N/A	N/A	5.25	N/A

Transactions for CLECs on all Releases Compared to IRTM Transactions – March 2003								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg – IA process	IRTM	Differences
		Obs.	Time (1)	Process Time	Process Time	(1)–(2)–(3)	Avg.	
				(Inbound) (2)	(Outbound) (3)		Time (4)	
ALL CLECs	ADDRVAL	355441	4.072	0.902	0.427	2.743	3.11	-0.367
(Excluded	SERVAVAIL	0	N/A	N/A	N/A	N/A	10.72	N/A
IRTM CLEC)	CSR	223510	5.074	1.105	0.549	3.42	3.65	-0.23
	APPTSCHED	1294	3.932	0.335	0.292	3.305	3.77	-0.465
	TN	1075	6.921	0.385	0.258	6.278	5.67	0.608
	FACCHECK	767	8.187	0.341	0.278	7.568	6.6	0.968
	ADSL LOOPQUAL	1743	19.817	0.754	0.267	18.796	15.01	3.786
	RESALE LOOPQUAL	0	N/A	N/A	N/A	N/A	6.43	N/A
	CFA	30	6.106	0.358	0.097	5.651	9.16	-3.509
	MPQ	0	N/A	N/A	N/A	N/A	6.15	N/A

The results show aggregated CLEC actual response times with and without IA processing time. As stated in the Notice of Compliance, Qwest is providing the results in this manner to allow for an accurate comparison of the results from actual transactions with results from IRTM transactions, since the processing time at the IA, as captured in actual transactions, is directly impacted by a CLEC's selection of hardware and software..

As Qwest has previously stated, the type of hardware a CLEC chooses can directly impact the transaction measurements. For example, if a CLEC uses nonstandard configurations,

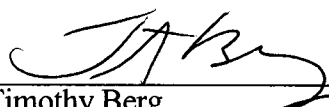
1 a slower server, or slower than normal network connections, then that CLEC's results will be
2 much greater than those of a CLEC using more efficient hardware. Additionally, because the
3 time period measured does not end until Qwest receives an acknowledgement from the CLEC,
4 the response time will be longer if a CLEC's IA takes longer to send the acknowledgement.
5 Further, it is possible for a CLEC to structure certain queries in a way that increases the
6 processing time, *e.g.*, by including multiple lines in a single ADSL Loop Qualification query.
7

8 In conclusion, Qwest has complied with the Staff's Impasse Resolution to develop the
9 capability to measure actual EDI transactions by year-end 2002. Qwest will now provide those
10 results on a quarterly basis, beginning with this filing setting forth the results for the first quarter
11 of 2003. Subsequent quarterly filings will be submitted until the 18 and/or 24 month timeframe
12 has been reached and a decision is made whether to modify the PIDs and whether future filings
13 are appropriate.
14

15 RESPECTFULLY SUBMITTED this 30th day of April, 2003.

16 FENNEMORE CRAIG, P.C.

17
18 By


Timothy Berg
Theresa Dwyer
3003 North Central Avenue, Suite 2600
Phoenix, Arizona 85012-2913

21 *Attorneys for QWEST Corporation*

22 ORIGINAL and 13 copies of the
23 foregoing hand-delivered for
filing this 30th day of April, 2003, to:

24 Docket Control
25 ARIZONA CORPORATION COMMISSION
1200 West Washington
26 Phoenix, Arizona 85007

1 COPY of the foregoing hand-delivered
this 30th day of April, 2003, to:
2
3 Maureen A. Scott
4 Legal Division
5 ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007
6 Ernest G. Johnson, Director
7 Utilities Division
8 ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007
9 Lyn Farmer, Chief Administrative Law Judge
10 Jane Rodda, Administrative Law Judge
11 Hearing Division
12 ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ 85007
13 COPY of the foregoing mailed
14 this 30th day of April, 2003, to:
15 Eric S. Heath
16 SPRINT COMMUNICATIONS CO.
100 Spear Street, Suite 930
San Francisco, CA 94105
17 Thomas Campbell
18 LEWIS & ROCA
19 40 N. Central Avenue
Phoenix, AZ 85004
20 Joan S. Burke
21 OSBORN MALEDON, P.A.
22 2929 N. Central Ave., 21st Floor
PO Box 36379
23 Phoenix, AZ 85067-6379
24 Thomas F. Dixon
25 WORLDCOM, INC.
707 N. 17th Street #3900
26 Denver, CO 80202

- 1 Scott S. Wakefield
RUCO
2 1110 West Washington, Suite 220
Phoenix, AZ 85007
3
- 4 Michael M. Grant
Todd C. Wiley
5 GALLAGHER & KENNEDY
2575 E. Camelback Road
6 Phoenix, AZ 85016-9225
7
- 8 Michael Patten
ROSHKA, HEYMAN & DEWULF
400 E. Van Buren, Ste. 900
9 Phoenix, AZ 85004-3906
10
- 11 Mark DiNuzio
COX COMMUNICATIONS
20402 North 29th Avenue
12 Phoenix, AZ 85027-3148
13
- 14 Daniel Waggoner
DAVIS, WRIGHT & TREMAINE
2600 Century Square
15 1501 Fourth Avenue
Seattle, WA 98101
16
- 17 Traci Grundon
DAVIS, WRIGHT & TREMAINE
1300 S.W. Fifth Avenue
18 Portland, OR 97201
19
- 20 Richard S. Wolters
Maria Arias-Chapleau
AT&T Law Department
21 1875 Lawrence Street, #1575
Denver, CO 80202
22
- 23 David Kaufman
E.SPIRE COMMUNICATIONS, INC.
24 343 W. Manhattan Street
Santa Fe, NM 87501
25
26


- 1 Diane Bacon, Legislative Director
COMMUNICATIONS WORKERS OF AMERICA
2 5818 N. 7th St., Ste. 206
3 Phoenix, AZ 85014-5811
- 4 Philip A. Doherty
5 545 S. Prospect Street, Ste. 22
6 Burlington, VT 05401
- 7 W. Hagood Bellinger
8 4969 Village Terrace Drive
9 Dunwoody, GA 30338
- 10 Joyce Hundley
11 U.S. DEPARTMENT OF JUSTICE
12 Antitrust Division
13 1401 H Street N.W. #8000
14 Washington, DC 20530
- 15 Andrew O. Isar
16 TELECOMMUNICATIONS RESELLERS ASSOC.
17 4312 92nd Avenue, NW
18 Gig Harbor, WA 98335
- 19 Raymond S. Heyman
20 ROSHKA, HEYMAN & DEWULF
21 400 N. Van Buren, Ste. 800
22 Phoenix, AZ 85004-3906
- 23 Thomas L. Mumaw
24 SNELL & WILMER
25 One Arizona Center
26 Phoenix, AZ 85004-0001
- Mike Allentoff
GLOBAL CROSSING SERVICES, INC.
1080 Pittsford Victor Road
Pittsford, NY 14534
- Andrea Harris, Senior Manager
ALLEGIANCE TELECOM INC OF ARIZONA
2101 Webster, Ste. 1580
Oakland, CA 94612

- 1 Gary L. Lane, Esq.
6902 East 1st Street, Suite 201
2 Scottsdale, AZ 85251
- 3 Kevin Chapman
4 SBC TELECOM, INC.
300 Convent Street, Room 13-Q-40
5 San Antonio, TX 78205
- 6 Richard Sampson
7 Z-TEL COMMUNICATIONS, INC.
601 S. Harbour Island, Ste. 220
8 Tampa, FL 33602
- 9 Megan Doberneck
COVAD COMMUNICATIONS COMPANY
10 7901 Lowry Boulevard
11 Denver, CO 80230
- 12 Kimberly M. Kirby
DAVIS DIXON KIRBY LLP
13 19200 Von Karman Avenue
Suite 600
14 Irvine, CA 92612
- 15 Richard P. Kolb
16 Vice President of Regulatory Affairs
ONE POINT COMMUNICATIONS
17 Two Conway Park
150 Field Drive, Ste. 300
18 Lake Forest, IL 60045
- 19 Attorney General
20 OFFICE OF THE ATTORNEY GENERAL
1275 West Washington
21 Phoenix, AZ 85007
- 22 Steven J. Duffy
23 RIDGE & ISAACSON, P.C.
3101 North Central Ave., Ste. 1090
24 Phoenix, AZ 85012
- 25
- 26

1 Karen Clauson
2 ESCHELON TELECOM
3 730 Second Avenue South, Ste. 1200
4 Minneapolis, MN 55402

4 Curt Huttzell
5 State Government Affairs
6 Electric Lightwave, Inc.
7 4 Triad Center, Suite 200
8 Salt Lake City, UT 84180

7 Brian Thomas
8 Time Warner Telecom, Inc.
9 223 Taylor Avenue North
10 Seattle, WA 98109

10 
11 _____
12 1415750.1/67817.250

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15

16

17

18

19

20

21

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